

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OMAR HURLOCK, on behalf of himself  
and all others similarly situated,

*Plaintiff,*

vs.

Case No. 1:25-cv-03891 (JLR)

KELSIER VENTURES, KIP PROTOCOL,  
HAYDEN DAVIS, GIDEON DAVIS,  
METEORA, THOMAS DAVIS, JULIAN  
PEH, and BENJAMIN CHOW,

*Defendants.*

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR AN ORDER  
DISSOLVING THE TEMPORARY RESTRAINING ORDER ENTERED ON MAY 29,  
2025, AND IN OPPOSITION TO THE ISSUANCE OF A PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. Proc. Rule 201(b)(2), Defendant Hayden Davis respectfully requests that the Court take judicial notice of the Resolution entered by the Anti-Corruption Office of the National Public Administration under the Ministry of Justice (“Anti-Corruption Office Resolution”), which is an official document of administrative proceedings in Argentina and is in the Spanish language, accompanied with a certified English translation of the same.

The Anti-Corruption Office Resolution is a publicly available document and is available at the following web address: <https://www.argentina.gob.ar/sites/default/files/resol-2025-9-apn-oamj.pdf>. This Court may take judicial notice of “official foreign government-promulgated documents.” *Lucina v. Carnival PLC*, No. 17-CV-6849, 2019 U.S. Dist. LEXIS 49371, 2019 WL 1317471 at \*6 n. 4 (E.D.N.Y. Mar. 21, 2019). The final decision of a foreign government is “clearly subject to judicial notice.” *Lichtenstein v. Cader*, 2013 U.S. Dist. LEXIS 127645, 2013 WL 4774717 (S.D.N.Y. Sept. 6, 2013) (taking judicial notice of publicly available decision of Hong Kong High Court); *see also Jordan (Berm.) Inv. Co. v. Hunter Green Invs, Ltd.*, 154 F.

Supp.2d 682, 689 (S.D.N.Y. 2001) (taking judicial notice of foreign judgment and considering it in deciding motion to dismiss where decision was “capable of accurate and ready determination by resort to sources whose accuracy cannot be reasonable questioned” (quoting Fed. R. Civ. Proc. 201(b)(2)).)

Dated: June 24, 2025

**SBAITI & COMPANY PLLC**

/s/ Mazin A. Sbaiti

Mazin A. Sbaiti

New York Bar No. 4339057

2200 Ross Avenue – Suite 4900W

Dallas, TX 75201

T: (214) 432-2899

F: (214) 853-4367

E: mas@sbaitilaw.com

**M. CRIS ARMENTA, P.C.**

M. Cris Armenta

*Pro Hac Vice forthcoming*

217 Clancy Way

Bozeman, MT 59718

T:: (310) 488-2080

F: (310) 421-1021

E: cris@crisarmenta.com

***COUNSEL FOR DEFENDANT  
HAYDEN DAVIS***